

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION**

NUCLEAR DEVELOPMENT, LLC, §  
§  
Plaintiff, § CIVIL ACTION CASE NUMBER:  
vs. § 5:18-cv-01983-LCB  
TENNESSEE VALLEY AUTHORITY, §  
§  
Defendant. §

**MOTION FOR ADMISSION  
PRO HAC VICE OF LARRY D. BLUST**

COMES NOW, Caine O'Rear III, attorney for Nuclear Development, LLC, plaintiff in the above-styled matter and pursuant to Rule 83.1(b) of the Uniform Local Rules of the United States District Court for the Northern District of Alabama moves for the admission *pro hac vice* of LARRY D. BLUST, as counsel for Nuclear Development, LLC in this case. As grounds therefore, movant shows as follows:

1. The undersigned is representing Nuclear Development, LLC in the above-styled cause in association with Larry D. Blust.
2. The undersigned is a member in good standing of the United States District Court for the Northern District of Alabama and is admitted to practice before this Court.

3. Larry D. Blust is a member in good standing and is eligible to practice in the following courts: Illinois Supreme Court (11-14-68), U.S. District Court for the Northern District of Illinois (1-27-69), U.S. Court of Appeals for the Seventh Circuit (unknown) U.S. Tax Court (7-15-74), and U.S. Court of Federal Claims (6-24-90), the district(s) wherein he resides and is regularly engaged in the practice of law. He is duly qualified for admission *pro hac vice* in this case pursuant to Local Rule 83.1(b)(1).

4. Larry D. Blust, residence address is: 1847 Lincoln, Chicago, Illinois 61434.

5. Larry D. Blust is a member of the law firm of Hughes Socol Piers Resnick Dym, LTD, [Office Address: 70 W. Madison Street, Suite 4000, Chicago, Illinois 60602, telephone number: (312) 604-2672; facsimile number: (312) 604-2673 and email address: [lblust@hsplegal.com](mailto:lblust@hsplegal.com)].

6. A Certificate of Good Standing of Larry D. Blust is attached hereto as Exhibit "A."

7. Mr. Blust understands and agrees to comport himself in accordance with the Code of Professional Responsibility of the United States District Court for the Northern District of Alabama, in his practice before this Honorable Court.

8. The undersigned will consent to designation and duties of Local Counsel pursuant to Local Rule 83.1(b)(2).

WHEREFORE, the above premises considered, this movant respectfully requests that Larry D. Blust be admitted *pro hac vice* by comity in accordance with the Local Rules of this Court to represent plaintiff, Nuclear Development, LLC.

Respectfully submitted,

*/s/ Caine O'Rear III*  
CAINE O'REAR III (OREAC6985)  
Attorney for Plaintiff  
HAND ARENDALL HARRISON SALE LLC  
P. O. Box 123  
Mobile, AL 36601  
(251) 432-5511  
Fax: (251) 694-6375  
[corear@handarendall.com](mailto:corear@handarendall.com)

**CERTIFICATE OF SERVICE**

I do hereby certify that, on December 6, 2018, I filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to any party or counsel appearing of record and that I served the same by placing the pleading in the United States Mail, postage pre-paid, to the following:

Tennessee Valley Authority  
Attn: Aaron B. Nix, Senior Manager, Realty Services and GIS  
1101 Market Street  
Chattanooga, TN 37402

U.S. Department of Justice  
Attn: Jay E. Town, United States Attorney for the Northern District of Alabama  
400 Meridian Street, Suite 304  
Huntsville, Alabama 35801

U.S. Department of Justice  
Attn: Matthew G. Whitaker  
Acting Attorney General  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

/s/ Caine O'Rear III

---